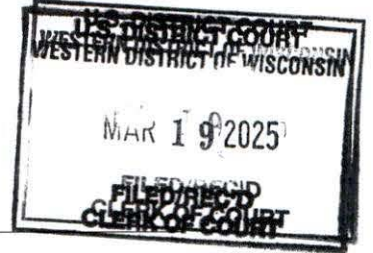


IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

v.

LUIS ABREU and CYBELL ABREU,

Defendants.

SEALED INDICTMENT

Case No. **25 CR 030 WMC**

18 U.S.C. § 1589(a)

18 U.S.C. § 1594(a) & (b)

8 U.S.C. § 1324

18 U.S.C. § 2(a)

THE GRAND JURY CHARGES:

COUNT 1

From in or about September 2015, to in or about March 2018, in the Western District of Wisconsin, the defendants,

LUIS ABREU AND CYBELL ABREU,

knowingly conspired and agreed to knowingly provide and obtain the labor and services of persons known and unknown to the Grand Jury by any one of, and by any combination of, the following means: (a) serious harm and threats of serious harm to those persons and other persons; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern intended to cause those persons to believe that, if those persons did not perform such labor and services, those persons and other persons would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), and 1594(b)).

COUNT 2

From in or about September 2015, to in or about August 2016, in the Western District of Wisconsin, defendant,

LUIS ABREU,

attempted to, and knowingly provided and obtained the labor and services of "John Doe 1," a person whose identity is known by the Grand Jury, by any one of, and by any combination of, the following means: (a) serious harm and threats of serious harm to "John Doe 1" and another person; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern intended to cause "John Doe 1" to believe that, if "John Doe 1" did not perform such labor and services, that "John Doe 1" and another person would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), and 1594(a)).

COUNT 3

From in or about February 2016, to in or about May 2017, in the Western District of Wisconsin, defendants,

LUIS ABREU AND CYBELL ABREU,

aided and abetted by one another, attempted to, and knowingly provided and obtained the labor and services of "John Doe 2," a person whose identity is known to the Grand Jury, by any one of, and by any combination of, the following means: (a) serious harm and threats of serious harm to "John Doe 2" and another person; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern

intended to cause "John Doe 2" to believe that, if "John Doe 2" did not perform such labor and services, that "John Doe 2" and another person would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), 1594(a), and 2).

COUNT 4

From in or about May 2016, to in or about January 2017, in the Western District of Wisconsin, defendants,

LUIS ABREU AND CYBELL ABREU,

aided and abetted by one another, attempted to, and knowingly provided and obtained the labor and services of "John Doe 3," a person whose identity is known to the Grand Jury, by means of: (a) serious harm and threats of serious harm to "John Doe 3" and another person; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern intended to cause "John Doe 3" to believe that, if "John Doe 3" did not perform such labor and services, that "John Doe 3" and another person would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), 1594(a), and 2).

COUNT 5

From in or about April 2016, to in or about September 2016, in the Western District of Wisconsin, defendants,

LUIS ABREU AND CYBELL ABREU,

aided and abetted by one another, attempted to, and knowingly provided and obtained the labor and services of "John Doe 4," a person whose identity is known to the Grand Jury, by any one of, and by any combination of, the following means: (a) serious harm

and threats of serious harm to “John Doe 4” and another person; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern intended to cause “John Doe 4” to believe that, if “John Doe 4” did not perform such labor and services, that “John Doe 4” and another person would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), 1594(a), and 2).

COUNT 6

From in or about May 2016, to in or about September 2016, in the Western District of Wisconsin, defendants,

LUIS ABREU AND CYBELL ABREU,

aided and abetted by one another, attempted to, and knowingly provided and obtained the labor and services of “John Doe 5,” a person whose identity is known to the Grand Jury, by any one of, and by any combination of, the following means: (a) serious harm and threats of serious harm to “John Doe 5” and another person; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern intended to cause “John Doe 5” to believe that, if “John Doe 5” did not perform such labor and services, that “John Doe 5” and another person would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), 1594(a) and 2).

COUNT 7

From in or about May 2016, to in or about June 2017, in the Western District of Wisconsin, defendants,

LUIS ABREU AND CYBELL ABREU,

aided and abetted by one another, attempted to, and knowingly provided and obtained the labor and services of "John Doe 6," a person whose identity is known to the Grand Jury, by any one of, and by any combination of, the following means: (a) serious harm and threats of serious harm to "John Doe 6" and another person; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern intended to cause "John Doe 6" to believe that, if "John Doe 6" did not perform such labor and services, that "John Doe 6" and another person would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), 1594(a), and 2).

COUNT 8

From in or about February 2017, to in or about March 2018, in the Western District of Wisconsin, defendants,

LUIS ABREU AND CYBELL ABREU,

aided and abetted by one another, attempted to, and knowingly provided and obtained the labor and services of "John Doe 7," a person whose identity is known to the Grand Jury, by any one of, and by any combination of, the following means of: (a) serious harm and threats of serious harm to "John Doe 7" and another person; (b) abuse and threatened abuse of law and legal process; and (c) any scheme, plan, and pattern intended to cause "John Doe 7" to believe that, if "John Doe 7" did not perform such labor and services, that "John Doe 7" and another person would suffer serious harm.

(In violation of Title 18, United States Code, Sections 1589(a) and (d), 1594(a), and 2).

COUNT 9

From in or about September 2015, to in or about August 2016, in the Western District of Wisconsin, the defendant,

LUIS ABREU,

knowing and in reckless disregard of the fact that “John Doe 1,” an alien, came to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded “John Doe 1” from detection in any place, including on the defendant’s property, and elsewhere, for the purpose of commercial advantage and private financial gain.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (1)(B)(i)).

COUNT 10

From in or about February 2016, to in or about May 2017, in the Western District of Wisconsin, the defendant,

LUIS ABREU,

knowing and in reckless disregard of the fact that “John Doe 2,” an alien, came to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded “John Doe 2” from detection in any place, including on the defendant’s property, and elsewhere, for the purpose of commercial advantage and private financial gain.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (1)(B)(i)).

COUNT 11

From in or about May 2016, to in or about January 2017, in the Western District of Wisconsin, the defendant,

LUIS ABREU,

knowing and in reckless disregard of the fact that "John Doe 3," an alien, came to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded "John Doe 3" from detection in any place, including on the defendant's property, and elsewhere, for the purpose of commercial advantage and private financial gain.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (1)(B)(i)).

COUNT 12

From in or about April 2016, to in or about September 2016, in the Western District of Wisconsin, the defendant,

LUIS ABREU,

knowing and in reckless disregard of the fact that "John Doe 4," an alien, came to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded "John Doe 4" from detection in any place, including on the defendant's property, and elsewhere, for the purpose of commercial advantage and private financial gain.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (1)(B)(i)).

COUNT 13

From in or about May 2016, to in or about September 2016, in the Western District of Wisconsin, the defendant,

LUIS ABREU,

knowing and in reckless disregard of the fact that “John Doe 5,” an alien, came to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded “John Doe 5” from detection in any place, including on the defendant’s property, and elsewhere, for the purpose of commercial advantage and private financial gain.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (1)(B)(i)).

COUNT 14

From in or about May 2016, to in or about June 2017, in the Western District of Wisconsin, the defendant,

LUIS ABREU,

knowing and in reckless disregard of the fact that “John Doe 6,” an alien, came to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded “John Doe 6” from detection in any place, including on the defendant’s property, and elsewhere, for the purpose of commercial advantage and private financial gain.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (1)(B)(i)).

COUNT 15

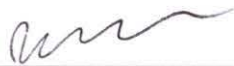
From in or about February 2017, to in or about March 2018, in the Western District of Wisconsin, the defendant,

LUIS ABREU,

knowing and in reckless disregard of the fact that "John Doe 7," an alien, came to, entered, and remained in the United States in violation of law, concealed, harbored, and shielded "John Doe 7" from detection in any place, including on the defendant's property, and elsewhere, for the purpose of commercial advantage and private financial gain.

(In violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii) & (1)(B)(i)).

A TRUE BILL



PRESIDING JUROR

Indictment returned: 2025-03-19



TIMOTHY M. O'SHEA
United States Attorney